

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE AMERICAN INTERNATIONAL GROUP,  
INC. SECURITIES LITIGATION

This Document Relates To: All Actions

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ECF CASE

Master File No. 04 Civ. 8141 (JES) (AJP)

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Oral Argument Requested  
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**DECLARATION OF ZACHARY M. RATZMAN IN SUPPORT OF  
LEAD PLAINTIFF'S MOTION FOR LEAVE TO AMEND THE COMPLAINT**

ZACHARY M. RATZMAN declares as follows pursuant to 28 U.S.C. § 1746:

1. I am of counsel to the law firm of Labaton Sucharow LLP, Court-appointed Co-Lead Counsel for the Ohio Public Employees Retirement System, State Teachers Retirement System of Ohio, and the Ohio Police & Fire Pension Fund (collectively, "Lead Plaintiff" or the "Ohio State Funds") in the above-titled action.

2. I am admitted to practice before this Court and the courts of the State of New York, and respectfully submit this declaration in support of Lead Plaintiff's motion for leave to amend the complaint.

3. Annexed hereto as Exhibit A is a true and correct copy of Lead Plaintiff's Proposed Consolidated Fourth Amended Class Action Complaint.

4. Annexed hereto as Exhibit B is a true and correct copy of the new allegations contained in the Proposed Consolidated Fourth Amended Class Action Complaint, broken out as a free-standing document.

5. Annexed hereto as Exhibit C is a true and correct copy of the April 7, 2005 Stipulation and Order extending the time for Lead Plaintiff to file an amended complaint.

6. Annexed hereto as Exhibit D is a true and correct copy of the July 21, 2005 Order Declaring the Ohio Funds As Lead Plaintiff Of the Entire Consolidated Class Action.

7. Annexed hereto as Exhibit E is a true and correct copy of cited excerpts from the transcript of the July 18, 2005 hearing before the Court.

8. Annexed hereto as Exhibit F is a true and correct copy of REDACTED

9. Annexed hereto as Exhibit G is a true and correct copy of REDACTED

10. Annexed hereto as Exhibit H is a true and correct copy of REDACTED

11. Annexed hereto as Exhibit I is a true and correct copy of REDACTED

12. Annexed hereto as Exhibit J is a true and correct copy of cited excerpts from the transcript of the June 3, 2008 hearing before the Court.

13. Annexed hereto as Exhibit K is a true and correct copy of a letter from Daniel J. Kramer to the Honorable John E. Sprizzo, dated May 19, 2008.

14. Annexed hereto as Exhibit L is a true and correct copy of a letter from Roberta A. Kaplan to the Honorable John E. Sprizzo, dated May 16, 2008.

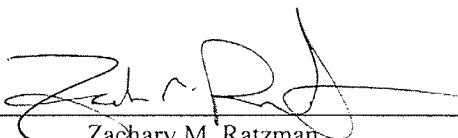
15. Annexed hereto as Exhibit M is a true and correct copy of a letter from Daniel J. Kramer to the Honorable John E. Sprizzo, dated June 2, 2008.

16. Annexed hereto as Exhibit N is a true and correct copy of the Memorandum of Law In Support of San Francisco Employees' Retirement System's Motion for Appointment as Lead Plaintiff and for Approval of its Selection of Lead Counsel, filed July 15, 2005.

17. Annexed hereto as Exhibit O is a true and correct copy of a letter from Max W. Berger to the Honorable John E. Sprizzo, dated June 3, 2008.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 9, 2008, at New York, New York.

  
Zachary M. Ratzman